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District Counsel

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE
REGIONAL MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897
Address: 869 N. Cherry Street
Tulare, CA 93274

CASE NO. 17-13797

DC No.: WW-1

Chapter 9

Date: N/A
Time: N/A
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

APPLICATION FOR ORDER SHORTENING TIME
FOR EMERGENCY HEARING ON MOTION FOR AUTHORIZATION TO REJECT
EXECUTORY CONTRACT (HEALTHCARE CONGLOMERATE ASSOCIATES, LLC)
TO THE HONORABLE RENÉ LASTRETO II, UNITED STATES BANKRUPTCY

1 JUDGE:

2 The Debtor, by and through counsel, respectfully seek an Order Shortening Time
3 for notice on the above Motion as follows:

4 **RELIEF SOUGHT:**

5 Rejection of executory contract.

6 Attached as Exhibit A is a copy of the proposed Motion showing the relief sought.

7 **REASON FOR REQUEST:**

8 The Declaration in Support describes the reason for the requested order
9 shortening time for an emergency hearing.

10 **DATE REQUESTED:** October 12, 2017 at 10:30 a.m.

11 WHEREFORE, Debtor requests that this Court enter its Order as follows:

12 1. That this Application be granted;
13 2. That the time for notice be shortened;
14 3. That notice be served upon Healthcare Conglomerate Associates, LLC,
15 the California Department of Public Health, all known creditors; the Debtor; and the U.S.
16 Trustee's Office.

17 4. The Hearing be held at the above date and time.
18 5. Debtor shall give notice to the required parties on or before October 10,
19 2017, by email or U.S. Mail, postage prepaid;

20 6. Objections, if any, can be presented:

21 ☒ At the time of the ☐ Up to ____ days prior to the hearing;
22 hearing; and

23 7. For such other relief as is just and proper.

24 Dated: October 10, 2017

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A Professional Corporation

26 By:

Riley C. Walter
Riley C. Walter, Attorneys for Debtor
Tulare Local Healthcare District